

Amendments to the Drawings:

The attached sheets of replacement drawings include changes to Fig. 4. The attached sheet for Fig. 4 replaces the original sheet and corrects for typographical errors and correction to characters that cross lines. No new matter has been added.

Attachment: Replacement Sheet

REMARKS

Applicants respectfully traverse and request reconsideration.

Applicants wish to thank the Examiner for the notice that claim 34 is allowed and that claims 10-15 and 29-32 would be allowable if written to overcome rejections under 35 U.S.C. §112, 2nd paragraph and to include all of the limitations of the base claim and any intervening claims. Applicants also wish to thank the Examiner for the notice that claim 18 would be allowable if rewritten in independent form.

The drawings are objected to due to a typographical error on page 8, line 29. Applicants have corrected the typographical error.

The drawings are also objected to because FIGs. 1, 2 and 4 include characters that cross lines. Applicants include a corrected FIG. 4 but are unable to locate the characters in FIGs. 1 and 2 that cross lines as alleged. Accordingly, Applicants respectfully request further clarification as to the objection if it is maintained.

The specification has been objected to as including a trademark. Applicants have noted that this a trademark in the specification.

Claims 1-15 stand rejected under 35 U.S.C. §112, 2nd paragraph, as being incomplete for omitting essential structural cooperative relationships of elements and in particular, has alleged that claim 1 does not show how the graphics rendering engine is related to the rest of the device. Claim 1 has been amended. Accordingly, Applicants respectfully request that this rejection be withdrawn.

Claims 19 and 27-32 stand rejected under 35 U.S.C. §112, 2nd paragraph, as failing to particularly point out and distinctly claim the subject matter of Applicants' invention. Claims 19 and 27 have been amended to correct typographical errors and as such, Applicants respectfully request withdrawal of this rejection.

Claims 1-5, 9 and 20-24 stand rejected under 35 U.S.C. §102(e) as being unpatentable by WIPO Patent Application No. 02/25416 to Girard et al. Applicants have amended claim 1

which now indicates that the device includes a graphics processor that is configurable as a secure or unsecure processor. By way of example, and not limitation, as noted for example on page 12 of Applicants' specification, a graphics processor can be configurable as a secure or unsecure chip, whether it is a single processor, multiple processor or system on a chip or any other suitable configuration. It may be configured through different structures including, for example, a designation bit or multiple bits residing within a graphics processor itself, a bit that may be read from a ROM residing on a graphics processor or any other suitable configuration. As such, the chip may be converted from an unsecure chip to a secure chip by fusing or by changing a bit or by other means. (See for example, page 13 and also in Applicants' specification). Such a structure does not appear to be taught in the cited reference and as such, the claims are believed to be in condition for allowance.

In addition, new claim 33 claims a graphics processor that may, for example, provide substituted data when, for example, a requesting client such as a CPU or any other client requests data from a secure region and a memory controller may instead obtain data from a nonsecure portion instead of a secure portion to complete the access cycle even though the request is made to a protected portion of the frame buffer memory. This claim is also believed to be in condition for allowance.

The dependent claims on claim 1 add additional novel and non-obvious subject matter and as such, are also in condition for allowance.

As to claim 20, Applicants respectfully reassert the relevant remarks made above with respect to claim 1 and as such, this claim is also believed to be in condition for allowance.

Dependent claims 21-24 are also believed to have additional novel and non-obvious subject matter.

Claim 16 stands rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,825,879 (Davis). Claim 16 has been amended to include the language in original claim 17 and claim 17 and 19 stood rejected under 35 U.S.C. §103(a) as being unpatentable over Davis in

view of U.S. Patent No. 6,148,403 to Haneda. Applicants respectfully submit that upon further evaluation of the Davis and Haneda references, that Davis teaches away from the claimed structure and operation since as Davis appears to teach to decrypt all enciphered information coming into the SVCP. Moreover, the office action admits that Davis does not disclose selectively encrypting data. In fact, selectively encrypting data would render the Davis system inoperative and would render the encryptor redundant. In addition, it would not solve Davis' problem.

Moreover, the Haneda reference is non-analogous. For example, Haneda is directed to an email and password entry system. In contrast, Applicants claim a graphics processing apparatus. For example, Haneda is directed to a data receiving apparatus in which mail from a sender for which a secret setting is made, cannot be directly confirmed. When a password is not inputted by a user or when an incorrect password is inputted by a user, the display indicates only a received mail list for emails from persons who are identified by personal data sets stored in advance which do not have a secret flag. In fact, the Haneda reference is directed to a completely different problem faced by Davis or Applicants. For example, Haneda is directed to a mail system and deals with a mechanism that does not require password protection of mail but is still restricted in access by others. (See for example, column 1 and 2). As such, it appears that improper hindsight may have been used to combine these references and as such, the claims are in condition for allowance.

Even for argument sake, the Haneda reference does not teach what is alleged in the office action. For example, the cited portion, namely column 14, lines 14-26 is alleged to teach selective encryption of data into a buffer for a graphics controller based upon the value of a flag and that the encryption module selectively scrambles data passed to a local memory and unscrambles data passing from the local memory according to the protection level of the data type. However, the cited portion instead states that the code constructing the mail data set is

encrypted. So that when a user inputs for example a password to display of a received mail list is provided based on a flag as part of a mail data set.

Claims 26-28 are allowable at least as depending from an allowable base claim.

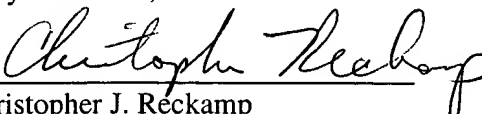
Claims 6, 7 and 25 are also allowable as depending upon allowable base claims and for adding additional novel and non-obvious subject matter.

As to claim 8, this claim has been rejected under 35 U.S.C. §103(a) as being unpatentable over Girard as applied to claim 4 and further in view of Karger et al. The Karger reference has been cited for teaching a memory protection system that has a privilege register to determine whether or not to allow the form operations and that this prevents an instruction from being executed when the processor is in the wrong operating mode. However, the claim requires, among other things, determining an access privilege of a client based on content of a client access privilege register and selecting one of the at least refusing access and permitting access of a client. This is distinctly different from the Karger reference since Karger first of all requires that the processor be operating in a dual mode. Applicants' claims are not directed to such an operation and instead are directed to the use of multiple reading clients during a single mode of operation. In addition, the Girard reference admittedly does not disclose how it is determined whether or not a client is entitled to secure access since Girard is not directed to such a multi-client determination. As such, the combination of references also fail to render the claimed invention obvious and as such, Applicants respectfully request allowance of the claim.

Accordingly, Applicants respectfully submit that the claims are now in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

Dated: 3-24-05

By: 
Christopher J. Reckamp
Reg. No. 34,414

Vedder, Price, Kaufman & Kammholz, P.C.
222 North LaSalle
Chicago, Illinois 60601
312/609-7500
312/609-5005 Facsimile